

United States District Court
Southern District Of Texas
FILED

AUG 23 2020

AO 91 (Rev. 11/11) Criminal Complaint

David J. Bradley, Clerk

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Izaak Omar RAMON
COB: US, YOB: 1990
Chappell La Jon RAYFORD
COB: US, YOB: 1992

Case No.

M-20-1613-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 22, 2020 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC 841(a)(1)	Did Knowingly and Intentionally Possess With the Intent to Distribute 434 Oxycodone pills (47.43g) and 30 Hydrocodone pills (16.38g), both Schedule II Controlled Substances; Did Knowingly and Intentionally Import With the Intent to Distribute 434 Oxycodone pills (47.43g) and 30 Hydrocodone pills (16.38g), both Schedule II Controlled Substances; Did Knowingly and Intentionally Conspire to Import with the Intent to Distribute 434 Oxycodone pills (47.43g) and 30 Hydrocodone pills (16.38g), both Schedule II Controlled Substances.
21 USC 841(b)(1)(C)	
21 USC 952(a)	
21 USC 963	

This criminal complaint is based on these facts:

See ATTACHMENT "A"

☒ Continued on the attached sheet.

Approved by AUSA Roberto Lopez

Submitted by reliable electronic means, sworn to
and attested to telephonically per Fed. R. Cr. 4.1,
and probable cause found on:

/s/ William A. Hartley

Complainant's signature

William A. Hartley, Special Agent, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/23/2020

@ 9:49 PM

City and state: McAllen, Texas

Judge's signature

Honorable J. Scott Hacker, U.S. Magistrate Judge

Printed name and title

ATTACHMENT "A"

On August 22, 2020, at approximately 12:40 p.m., the subject later identified as Izaak Omar RAMON (hereinafter referred to as "RAMON") applied for entry into the United States at the Progreso Port of Entry (POE) in Progreso, Texas.

At Primary Inspection, a Customs and Border Protection Officer (CBPO) asked RAMON if he had purchased anything in Mexico or if he had any medication, alcohol, tobacco or drugs he would like to declare, at which time, RAMON stated he did not.

RAMON stated he had gone to Mexico to see a Dentist and was going to return to his home in Poteet, Texas. The CBPO referred RAMON to Secondary Inspection for further inspection due to his travel inconsistencies.

Once at Secondary Inspection, another CBPO asked RAMON if he had any medication, drugs, firearms and/or money over \$10,000.00 United States Dollars (USD) that he would like to declare, at which time, RAMON stated once again that he did not. Additional CBPOs conducted a pat down of RAMON, at which time, 434 Oxycodone pills (47.43g) and 30 Hydrocodone pills (16.38g) were found concealed within RAMON's groin area.

While CBPOs were conducting the seizure of the pills found concealed within RAMON's groin area, RAMON's cellular phone rang displaying a message from someone by the name of "Ditto". Without being asked, RAMON freely stated to CBP personnel that the medication was not for himself, and that he was doing this for his friend "Ditto". With CBP's Border Search Authority, RAMON provided the passcode to his cellular phone, at which time a CBPO conducted a brief manual inspection of the cellular phone. The last conversation noted was with the individual known as "Ditto" who was sending RAMON messages during the seizure. The conversation CBP viewed showed that RAMON sent this "Ditto" a text message stating that he was recounting the pills.

After this, CBP was advised that an individual identified as Chappell La Jon RAYFORD (hereinafter referred to as "RAYFORD") was in the Secondary Inspection area inquiring about his friend, RAMON.

Homeland Security Investigations (HSI) Assistant Special Agent in Charge (ASAC) McAllen, Texas office Special Agent (SA) William A. Hartley proceeded to the Progreso, Texas POE, and upon arriving, SA Hartley and CBPO-Enforcement (CBPO-E)

Following this interview, SA Hartley made contact with the individual identified as RAYFORD at the Progreso POE, and asked RAYFORD if they could have a conversation, at which time RAYFORD agreed to do so. SA Hartley and CBPO-E Silva proceeded to speak with RAYFORD, and during the post-Miranda interview, SA Hartley asked RAYFORD if he went by the nickname of "Ditto", at which time RAYFORD stated he did. RAYFORD denied all knowledge of the incident at hand, stating he did not know what was going on, and that he had no part of it. When confronted with text messages found on RAMON's cellular phone showing RAMON and "Ditto" talking about the amount of pills being bought, RAYFORD advised that he wanted a lawyer, at which time, the interview concluded. Further review of text messages found in RAMON's cellular phone, specifically from Wednesday, August 5, 2020, showed a text message conversation between RAMON and "Ditto", during which "Ditto" stated, "Yes sir I'll hit u. I'm tryna find me another person to get pills from Mexico so I ain't gotta use this hoe", indicating previous instances of this type of illicit activity.

Following this, RAMON was shown a photo of RAYFORD, at which time RAMON stated RAYFORD was the "Ditto" in question.